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March 14, 2023

HON. GREGORY H. WOODS
United States Magistrate Judge
United States District Court
500 North Pearl Street, Room 2260
New York, NY 10007

Re: United States of America and States of the United States, ex rel.
Donoghue v. Richard Carranza, et al., No. 1:20-cv-5396 (GWH)(SDH)

Dear Judge Woods:

We represent the Defendants Buffalo Public School District and Kriner Cash, in his official capacity as Superintendent ("Buffalo Defendants"), in the above action.

We write to respectfully join in the New York City and other Defendants requests for a thirty-day extension of time to move for attorneys' fees under 31 U.S.C. 3730(d)(4)(Dkt. #260). Like the other Defendants, this extension will afford the Buffalo Defendants additional time to properly evaluate the relevant legal standards and their applicability to this case. It will also promote judicial efficiency by avoiding piecemeal litigation of the attorneys' fees issues.

This is the request for an extension of time to file this motion.

Respectfully yours,

NATHANIEL KUZMA, ESQ.
General Counsel

/s/ Robert E. Quinn

By: Robert E. Quinn
Assistant Legal Counsel

CC: All Counsel (by ECF)